

1 AARON D. FORD
2 Attorney General
MEREDITH N. BERESFORD, Bar No. 13308
3 Deputy Attorney General
State of Nevada
4 Public Safety Division
100 N. Carson Street
Carson City, NV 89701-4717
5 Tel: (775) 684-1120
E-mail: mberesford@ag.nv.gov

6 *Attorneys for Defendants*
7 *Miguel Sandoval*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 RAKIM CADDELL,
11 Plaintiff,
12 v.
13 WILLIAM GITTERE, *et al.*,
14 Defendants.

Case No. 3:19-cv-00053-MMD-WGC

**ORDER GRANTING
MOTION FOR EXTENSION OF
DISPOSITIVE MOTION DEADLINE TO
AUGUST 24, 2020**

15 Defendant, Miguel Sandoval, by and through counsel, Aaron D. Ford, Attorney General of the
16 State of Nevada, and Meredith N. Beresford, Deputy Attorney General, hereby files this Motion for
17 Extension of Dispositive Motion Deadline to August 24, 2020. This motion is based on Federal Rule of
18 Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and
19 pleadings on file in this action.

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 **I. ARGUMENT**

22 Defendants respectfully request an extension of time to August 24, 2020 to file dispositive
23 motions from the current deadline of August 5, 2020, set forth in the Court's Scheduling Order dated
24 April 7, 2020 (ECF No. 19). Attached as Exhibit A is a stipulation with Counsel for Plaintiff to extend
25 the deadline to August 24, 2020. Counsel for Plaintiff is new to the case. and both parties would like an
26 opportunity to discuss settlement prior to the dispositive motion deadline. Further, this request has been
27 necessitated by recent quarantine measures imposed in response to the COVID-19 virus pandemic.
28 Namely, Governor Sisolak issued a "stay at home" directive on April 1, 2020, whereby Deputy

1 Attorneys General and other staff are required to utilize home-based working arrangements. As a
2 result, the already limited staff at the Office of the Attorney General is rendered less efficient due to
3 constraints imposed by limited Virtual Private Networks (VPN) and lack of remote document access.

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:
5 When an act may or must be done within a specified time, the court may, for good cause, extend the
6 time: (A) with or without motion or notice if the court acts, or if a request is made, before the original
7 time or its extension expires; or (B) on motion made after the time has expired if the party failed to act
8 because of excusable neglect.

9 The requested extension of time should afford Defendants adequate time to prepare and file a
10 motion for summary judgment in this case as well as engage in good faith settlement negotiations with
11 Plaintiff.

12 For these reasons, Defendants respectfully request a 19-day extension of time from the current
13 deadline to file a motion for summary judgment in this case, with a new deadline to and including
14 **Monday, August 24, 2020**. Likewise, Defendants respectfully request that the Court revise the deadline
15 for the joint pretrial order to be modified accordingly as set forth below.

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Schedule for Remaining Deadlines

Dispositive motion deadline **August 24, 2020**

Joint pretrial order (if no dispositive motions pending)* **September 23, 2020**

*Or 30 days after the decision of any pending dispositive motions.

DATED this 5th day of August, 2020.

AARON D. FORD
Attorney General

By: /s/Meredith N. Beresford
MEREDITH N. BERESFORD, Bar No. 13308
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED.

Walter G. Cobb
UNITED STATES MAGISTRATE JUDGE

DATED: August 6, 2020

1 AARON D. FORD
2 Attorney General
MEREDITH N. BERESFORD, Bar No. 13308
3 Deputy Attorney General
State of Nevada
4 Public Safety Division
100 N. Carson Street
Carson City, NV 89701-4717
5 Tel: (775) 684-1120
E-mail: mberesford@ag.nv.gov

6 *Attorneys for Defendants*
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14 Defendants.

15 Case No. 3:19-cv-00053-MMD-WGC

16 **STIPULATION TO CONTINUE DEADLINE**
FOR MOTION FOR SUMMARY
JUDGMENT TO AUGUST 24, 2020

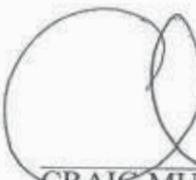
17 Defendant, Miguel Sandoval, by and through counsel, Aaron D. Ford, Attorney General of the
18 State of Nevada, and Meredith N. Beresford, Deputy Attorney General, and Rakim Caddell, by and
19 through counsel, Craig Mueller, hereby stipulate to continue the Motion for Summary Judgment
deadline from August 5, 2020 to August 24, 2020.

20 DATED this 5th day of August, 2020.

21 AARON D. FORD
22 Attorney General

23 By: /s/ Meredith N. Beresford
MEREDITH N. BERESFORD,
Bar No. 13308
24 Deputy Attorney General

25 *Attorneys for Defendants*

26 By: 
CRAIG MUELLER,
Bar No. 4703

27 *Attorney for Plaintiff*

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